



0000082996

INTERVENTION

ORIGINAL

RECEIVED

2002 JAN 11 P 12:36

AZ CORP COMMISSION
DOCUMENT CONTROL

1 Jose L. _____
2 Nogales City Attorney
3 State Bar # 004917
4 777 North Grand Avenue
5 Nogales, Arizona 85621
6 (520) 287-6571
7 Attorney for City of Nogales

BEFORE THE ARIZONA CORPORATION COMMISSION

6 IN THE MATTER OF THE)
7 APPLICATION OF THE ARIZONA)
8 ELECTRIC DIVISION OF CITIZENS)
9 COMMUNICATIONS COMPANY TO)
10 CHANGE THE CURRENT PURCHASED)
11 POWER AND FUEL ADJUSTMENT)
12 CLAUSE RATE, TO ESTABLISH A NEW)
13 PURCHASED POWER AND FUEL)
14 ADJUSTMENT CLAUSE BANK, AND)
15 TO REQUEST APPROVED GUIDELINE)
16 FOR THE RECOVERY OF COSTS)
17 INCURRED IN CONNECTION WITH)
18 ENERGY RISK MANAGEMENT)
19 INITIATIVES.)

DOCKET NO.: E-01032C-00-0751

MOTION TO INTERVENE

DOCKETED

JAN 11 2002

DOCKETED BY

14 City of Nogales, Arizona, as authorized by its City Council, hereby moves the
15 Corporation Commission to grant City of Nogales leave to intervene in the above captioned
16 proceeding. In support hereof, City of Nogales states as follows:

17 1. Citizens Utilities Company's certificated service territory includes geographic
18 areas located within the City of Nogales, Citizens uses rights-of-way granted by City of
19 Nogales, and Citizens provides electric service to City of Nogales and many of its residents
20 and businesses.

21 2. City of Nogales is directly and substantially affected by Citizens' proposed cost
22 recovery and associated rate adjustments, and City of Nogales can best represent its own
23 interests in this proceeding.

24 3. City of Nogales' participation in this proceeding will not unduly broaden the
25 nature or scope of this proceeding. City of Nogales, like the Commission, desires to
26 determine whether Citizens' recovery proposal is in the public interest. Intervention is
27 permitted in this matter until January 11, 2002 pursuant to the Procedural order dated
28

1 November 15, 2001.

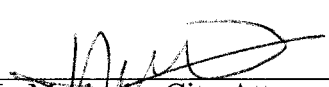
2 4. Service of all correspondence, documents or pleadings should be made to counsel
3 for City of Nogales as follows:


4 Jose L. Machado
5 City Attorney
6 777 North Grand Avenue
7 Nogales, Arizona 85621
8 (520) 287-6571

9 For the foregoing reasons, City of Nogales, respectfully requests that the
10 Commission issue its Order granting this Motion to Intervene.


11 RESPECTIVELY SUBMITTED this 10th day of January, 2002.

12 CITY OF NOGALES

13 
14 Jose L. Machado, City Attorney
15 City of Nogales
16 777 North Grand Avenue
17 Nogales, Arizona 85621
18 Telephone: (520) 287-6571
19 Facsimile: (520) 287-9159
20 E-mail: jmachado@cityofnogales.net

21 The original and
22 ten copies were 
23 filed this 10th day of
24 January, 2002 with:

25 Docket Control
26 Arizona Corporation Commission
27 1200 West Washington Street
28 Phoenix, Arizona 85007-2996

29 Copy of the foregoing mailed 
30 this 10th of January, 2002, to:

31 Carl Dabelstein
32 Citizens Utilities Company
33 2901 N. Central Avenue, Suite 1660
34 Phoenix, Arizona 85012

1 Michael M. Grant
Todd C. Wiley
2 GALLAGHER & KENNEDY
2575 Camelback Road
3 Phoenix, Arizona 85016-9225
Attorneys for Citizens Communications Company
4
5 Scott S. Wakefield, Chief Counsel
RUCO
2828 N. Central Avenue, Suite 1200
6 Phoenix, Arizona 85004
7
8 Walter W. Meek, President
Arizona Utility Investors Association
2100 N. Central Avenue, Suite 210
Phoenix, Arizona 85004
9
10 Lyn Farmer, Chief Counsel
Legal Division
ARIZONA CORPORATION COMMISSION
11 1200 West Washington Street
Phoenix, Arizona 85007
12
13 Ernest Johnson, Director
ARIZONA CORPORATION COMMISSION
1200 West Washington Street
14 Phoenix, Arizona 85007
15
16 John White
Deputy County Attorney
P.O. Box 7000
Kingman, Arizona 86402
17
18 Holly Hawn
Deputy County Attorney
2150 N. Congress Drive, Suite 201
19 Nogales, Arizona 85621
Attorney for Santa Cruz County
20
21
22
23
24
25
26
27
28